



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Lauren F. Silver
Labor and Employment Law Division
Telephone: (212) 356-2507

November 30, 2023

Via ECF
The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Eucharia Enechi v. City of New York, et al., No. 20-cv-08911(PAE)

Dear Judge Engelmayer:

I am an Assistant Corporation Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and was just recently assigned to represent Defendants in the trial of the above-referenced action. I write jointly with Plaintiff's counsel to request an extension of time from December 13, 2023, to December 22, 2023, to file the joint pretrial order and motions in limine for this matter.

The undersigned was just recently assigned as trial counsel to this case and needs additional time to familiarize myself with the case and its voluminous record, which includes 11 depositions and thousands of pages of documents that were produced in this litigation. This is the parties' first request to extend the deadline to submit pretrial materials.

Additionally, the parties have conferred and propose the following schedule for submission of the Joint Pretrial Order ("JPTO"):

- December 6, 2023, Plaintiff will transmit to Defendants a draft JPTO;
- December 14, 2023, Defendants to provide Plaintiff with edits to the JPTO;

- December 14, 2023 to December 22, 2023, the parties will finalize the JPTO;
- December 22, 2023 the parties will file the JPTO, as well as the other pretrial materials.

Accordingly, the parties jointly request an extension to December 22, 2023, to file their pretrial materials. We thank the Court for considering our request.

Respectfully submitted,

/s/ Lauren F. Silver
Lauren F. Silver
Assistant Corporation Counsel
lasilver@law.nyc.gov

Cc: Plaintiff's counsel via ECF

GRANTED. The joint pretrial order in this case is due December 22, 2023, as are any motions *in limine*. In view of the holiday season, the Court *sua sponte* extends the deadline for replies to any motions *in limine* to January 9, 2024. SO ORDERED.

Dated: December 1, 2023
New York, New York


PAUL A. ENGELMAYER
United States District Judge